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**From:** Arvizu, Christy  
**Sent:** Tuesday, October 04, 2016 7:30 AM  
**To:** 'Latessa, Sara H (DEC)' <[Sara.Latessa@dec.ny.gov](mailto:Sara.Latessa@dec.ny.gov)>  
**Subject:** RE: Linear Approach v. NY 590

Hi Sara –

Thanks again for your message yesterday.

Will NYSDEC be following up with a side-by-side comparison of how the ANMP requirements stack up with 122.42(e)(5)? It was my understanding that both EPA and NYSDEC would take a look at the requirements of the reg and see where NYSDEC's ANMP meets each component. Since the language in the fact sheet states "... these methods are combined to form the NRCS Standard NY 590 which meets this federal requirement and is required to be followed by all permitted CAFOs", a review of each approach and a checklist/comparison that shows how NYSDEC's ANMP requirements meet the regulations should be done. Or, if as you stated, the linear approach appears to "check off the boxes" for NYSDEC, it'd be great if a demonstration (e.g. list) showing how it meets the requirements of the linear approach is provided.

If I misunderstood, please let me know. I also thought Greg was going to take a look at it as well. Was I mistaken?

Thanks,  
Christy

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**From:** Latessa, Sara H (DEC) [<mailto:Sara.Latessa@dec.ny.gov>]  
**Sent:** Monday, October 03, 2016 9:12 AM  
**To:** Arvizu, Christy <[Arvizu.Christy@epa.gov](mailto:Arvizu.Christy@epa.gov)>  
**Subject:** Linear Approach v. NY 590

Hi Christy,

So with my limited understanding ☺ I took a look at 590 in comparison to the terms listed in 122.42(e)5 and I think (if I'm understanding it correctly) that 590 matches pretty closely to the Linear approach. I think you'll find most (if not all) of the required terms listed in the "Plans and Specifications" section of 590 on pages 10-11 of the Standard. Of course the rest of 590 goes into more detail about each of the listed items...but I think this section "checks the boxes" for us. A big part of 590 points to the N Leaching Index and P Index...so again, more details can be found there. Let me know if you think we're ok here. Looking forward to hearing back from you....

And I'm working on the other changes discussed during our meeting. I'll have some modified language to send shortly. Feeling optimistic that we might actually have a new permit!

Thanks!,

Sara

## **Sara H. Latessa**

Environmental Program Specialist, Division of Water

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